

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

CARL FORSELL	:	Case No. 5:22-cv-01454-SL
d/b/a NONCE PTE., LTD,	:	
	:	
Plaintiff,	:	JUDGE SARA LIOI
	:	
-v-	:	MAGISTRATE JUDGE HENDERSON
	:	
SQUIRRELS, LLC., et al.,	:	
	:	
Defendants.	:	

**PLAINTIFF CARL FORSELL, D/B/A NONCE PTE., LTD'S MOTION TO
EXTEND TIME TO RESPOND TO DEFENDANT DAVID STANFILL'S
MOTION TO DISMISS AMENDED COMPLAINT**

Plaintiff Carl Forsell, d/b/a Nonce PTE, Ltd., by and through undersigned, hereby respectfully requests a sixty (60) day extension of time to respond to Defendant David Stanfill's Motion to Dismiss Amended Complaint, filed on April 1, 2024. *See Def. Mot. to Dismiss, Apr. 1, 2024, [ECF 33].* For cause, Plaintiff contends that he served written discovery upon Defendant Squirrels, LLC, the purpose of which was in part to determine whether it is appropriate for Plaintiff to pursue Mr. Stanfill for the due and owing debt that underlies this action. The responses to the written discovery are not yet due under the Federal Rules of Civil Procedure and Local Rules of this Court, and to date the written discovery has not been responded to in full. Plaintiff respectfully requests additional time to respond to the Motion to Dismiss so to have an opportunity to review the discovery responses.

Additionally, this matter has been referred to mediation which will take place prior to June 28, 2024. *See Notice of Designation of Neutral, Apr. 29, 2024, [ECF 42].* Plaintiff hopes to

achieve voluntary resolution to his claims at this mediation which would in turn moot any cause of action he may have against Mr. Stanfill. Thus, in the interest of efficiency, Plaintiff respectfully requests additional time to respond to the Motion to Dismiss until after the mediation has concluded, in the event the matter remains pending following the same.

This request is not sought for the purpose of causing delay and will not be prejudicial to any of the parties to this case, or the Court.

Respectfully submitted,

/s/- Thomas L. Sooy
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2024, the forgoing was served via electronic mail and/or the Court's electronic filing system upon the following:

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/s/- Thomas L. Sooy, Esq.